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August 13, 2024

Via ECF

The Honorable Renée Marie Bumb
United States District Court
Mitchell H. Cohen Building and
U.S. Courthouse
Courtroom 3D
4th & Cooper Streets
Camden, NJ 08101

Dear Chief Judge Bumb,

At the July 23, 2024 CMC, counsel for Defendants raised an issue regarding combined jury instructions, specifically an authority from the Seventh Circuit, and requested an opportunity to submit briefing on the authority to the Court. (7/23/24 CMC Tr., at 302:16-305:20 (your Honor stating “I’ll take a look at it” and “I’ll read the case”).)

The parties have meet-and-conferred and arrived at an agreeable briefing schedule, which is submitted to the Court herein. Defendants’ brief shall be filed on or before August 22, 2024, and Plaintiffs’ response shall be filed on or before August 30, 2024. The parties have jointly agreed that neither brief shall exceed five (5) pages.

Thank you for your consideration.

John R. Davis
/s/ John R. Davis